

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,
v.
D-1 FCA US LLC,

Defendant.

Case 2:21-cr-20031
Assigned to: Nancy G. Edmunds
Referral Judge: Elizabeth A. Stafford
Assign Date: 1/27/2021
HONORABLE Description: INFO USA v. FCA US
LLC (SO)

**Violation: Conspiracy to Violate
the Labor Management Relations
Act (18 U.S.C. § 371 & 29 U.S.C.
§§ 186(a)(2) & (d)(1))**

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

**(18 U.S.C. § 371 – Conspiracy to Violate the
Labor Management Relations Act)**

D-1 FCA US LLC

1. Between in or before approximately January 2009 and continuing through in or after approximately 2016, in the Eastern District of Michigan and elsewhere, defendant FCA US LLC (FCA) did knowingly and voluntarily conspire with other individuals and entities to violate the Labor Management Relations Act, 29 U.S.C. §§ 186(a)(2) & (d)(1).

2. The objects of this conspiracy were:

(a) that one or more persons acting in the interest of FCA would willfully pay and deliver—and agree to pay and deliver—money and things of value to officers and employees of the International Union, United Automobile, Aerospace, and Agricultural Implement Workers of America (UAW), the labor organization representing FCA's employees, using the bank accounts and credit cards of the UAW-Chrysler Skill Development & Training Program d/b/a the UAW-Chrysler National Training Center (NTC), with the intent to benefit persons whom they knew were not permitted to receive the money and things of value, in violation of Title 29, United States Code, Section 186(a)(2), (d)(1); and

(b) that officers and employees of the UAW would willfully request, receive, and accept—and agree to receive and accept—money and things of value from one or more persons acting in the interest of FCA, using the bank accounts and credit cards of the NTC, with the intent to benefit themselves and other persons whom they knew were not permitted to receive the money and things of value, in violation of Title 29, United State Code, Section 186(b)(1), (d)(1).

3. Between in or before approximately January 2009 and continuing through

in or after approximately 2016, one or more persons acting in the interest of FCA agreed to pay and deliver, and willfully paid and delivered, more than \$3.5 million in prohibited payments and things of value to officers and employees of the UAW.

4. One or more members of the conspiracy completed one or more of the following acts to effect the objects of the conspiracy:

- In June 2014, FCA Vice President Alphons Iacobelli authorized the expenditure of approximately \$262,000 to satisfy the outstanding mortgage on the residence of UAW Vice President General Holiefield in Harrison Township, Michigan.
- In August 2014, FCA Vice President Alphons Iacobelli authorized the expenditure of approximately \$25,000 for a party for UAW Vice President Norwood Jewell and the UAW's International Executive Board.
- In January and February 2015, FCA Vice President Alphons Iacobelli approved the use of NTC credit cards to pay for over \$30,000 in meals for UAW officials at various restaurants in Palm Springs and southern California.

All in violation of Title 18, United States Code, Section 371.

MATTHEW SCHNEIDER
United States Attorney

s/*David A. Gardey*
David A. Gardey
Assistant United States Attorney

s/*Erin S. Shaw*
Erin S. Shaw
Assistant United States Attorney

Date: January 27, 2021